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From: "Tammy N. Koeppen" <tammy@alphaprosolutions.com>
To: <wvogl@samhsa.gov>
Date: 7/16/04 10:01AM
Subject: NPRM Response Docket # 04-7984 Revised Mandatory Guidelines

Dear Walt:

My comments are regarding training in consideration of alternative technologies. Alpha Pro Solutions is an internationally recognized training company offering regulated and non-regulated drug-free workplace training and certification including Drug Test Collector and Instructor training. APS was first to market with a full line of DFWP computer-based training courses that have been DOT-approved and/or reviewed.

Required drug test collector proficiency in a variety of methodologies (urine, saliva, hair, sweat, rapid kits) should, in my opinion, be similar to training requirements for certified Alcohol Technicians (BATs and STTs). Currently BATs and STTs are required to be trained and demonstrate proficiency (as monitored by a qualified monitor/instructor) on each make/model of device used. Documentation of training must be maintained by the BAT/STT and provided upon request by the employer or government agency.

Because there are so many iterations of alternative technology testing kits and forms, I believe that a minimum the collector must be trained #1 to proficiency as currently required in urine drug testing, and #2 additionally be trained on each methodology the collector will use for testing (similar to the make/model requirement for BATs/STT). I believe it is unreasonable to "require" a collector to be trained in e.g. urine, hair, saliva, sweat and rapid kits, if his/her collection facility is only using e.g. urine and hair; or urine and saliva. Therefore I do not believe it should be mandatory for each collector to be trained in all methodologies. I do believe, it should be mandatory for collector instructors to be knowledgeable in all approved methodologies.

The current training proficiency sheets used can be easily modified to have multiple columns for proficiency tests with varying methodologies. I recommend coming up with a standard training proficiency sheet because currently it is up to the training provider to devise their own forms.

To me, however, the bigger challenge is accomplishing true proficiency due to the huge variety of kit types available within each methodology group (particularly rapid test kit types). Test kits collection procedures, positive versus negative indicators, activation and reading times, etc. vary a lot, as do the corresponding testing forms usually provided by the kit manufacturer. To say an individual is proficient in all individual kits within a methodology group is misleading. Therefore, we may want to consider requiring proficiency on the specific kit type without creating an undue burden on collection sites and employers.

At a minimum, the testing forms should be standardized to accommodate all methodologies or kit types.

I believe the 5 year re-certification requirement is too long given evolving changes in alternative methodologies and kits. I recommend a 2 year refresher, and a 5 year re-certification requirement.

I am willing to volunteer my time to a Training Committee as these proposed rules evolve. Please contact me.

Respectfully,

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